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January 3, 2008

Ms. Sheryl Parker
HQ ACC/A7PP
129 Andrews St., Suite 102
Langley AFB, VA 23665-2769

Dear Ms. Parker:

RE: Notice of Intent To Prepare an Environmental Impact Statement for Utah Test and Training Range Military Operations Area

The Aircraft Owners and Pilots Association (AOPA), representing more than 414,000 general aviation pilots, including 8,100 in the Nevada and Utah areas, submits the following comments regarding the Environmental Impact Statement (EIS) the Air Force intends to prepare as part of the White Elk Military Operations Area (MOA) initiative. AOPA wants to ensure that the impacts on civil and commercial aviation are addressed in the EIS.

Environmental Study Must Include Airspace

In accordance with the ruling by the United States Fifth Circuit Court of Appeals (No. 02-60288), any environmental studies conducted under the National Environmental Policy Act (NEPA) must include discussion regarding the impact to civil and commercial aviation. The ruling states "*Civil and Commercial aviation are part of the modern human environment broadly defined, and because the [proposed airspace] would impact aviation, NEPA required the Air Force to address that impact in the EIS.*" AOPA expects the Air Force to take into consideration all aspects of these impacts including the safety and economic impacts.

Safety and Economic Consequences

Based on preliminary discussions AOPA has had with the Air Force, the Association has significant safety and economic concerns with the Air Force's plan to implement Special Use Airspace (SUA) at 14,000 mean sea level (msl) and above. If the military moves ahead with the creation of SUA at this flight level, it would severely impact access to Victor 269 (V-269), a prominent North/South victor route. This would allow only 1000 feet of useable airspace between the minimum enroute altitude of V-269, severely limiting the means to avoid weather and icing.

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AOPA is also concerned with negative economic impacts of the proposed SUA. As proposed, the White Elk MOA would force pilots operating under instrument flight rules to circumnavigate the MOA along another Victor airway. This reroute would result in an increase in flight distance of over 60 miles and would cost users hundreds of dollars each way. Furthermore, this alternate airway may not be a viable option for all aircraft operations due to the increased minimum enroute altitude required.

AOPA strongly recommends the Air Force take these factors into consideration in the EIS and mitigate the impacts.

EIS Structure

AOPA recommends the Air Force include an Adverse Impact Matrix in the EIS and ensure it is contained within the Executive Summary at the beginning of the document. This allows users and interested parties to understand the full effect of each alternative and its associated impacts.

AOPA appreciates the opportunity to comment on the White Elk MOA EIS at this early stage and looks forward to the opportunity to work with the Air Force to mitigate the impact on general aviation.

Sincerely,

A handwritten signature in black ink, appearing to read "Pete Lehmann". The signature is fluid and cursive, with a long horizontal stroke at the end.

Pete Lehmann
Government Analyst
Air Traffic Services